

Remarks

Claims 1, 2, 4 to 8, 10, 11, 13, 14 and 16 to 18 remain in this application.

Claim 1 has been amended to clarify that each word of a randomly generated phrase is randomly generated as suggested by Examiner Davis on June 2, 2010. As amended claim 1 is believed to be in conformance with 35 USC 112.

Reconsideration of the rejection of claim1 as being unpatentable over Hattori in view of Higgins is requested

The Examiner considers that Hattori discloses a data base having a plurality of words and language rules for randomly generating one-time challenge phrases citing col. 9, lines 19-47; col. 8, line 65 to col. 9, line 5 and considers a "specified text" provided to a user as a random phrase. The Examiner is in error.

Hattori discloses at col. 8, line 65 *et seq* "The speaker recognition device according to the present invention judges whether or not an unknown speaker is a genuine registered speaker (i.e. a customer), by instructing the unknown speaker to utter at least two kinds of things: a 'specified text' and a 'password'. The specified text is specified by the speaker recognition device or by the user of the device, and the password is decided by each speaker to be registered on speaker registration." Clearly the "password" is not generated by a data base. Likewise, a "specified text" generated by the user is not generated by a data base.

Hattori discloses that a text generation section 201 generates a "specified text" to be uttered by an unknown speaker (col. 2, lines 5-6; col. 14, lines 47-48; col. 18, lines 6-7; and col. 19, lines 58-59). However, Hattori does not disclose how the "specified text" is generated. Clearly, this is no disclosure that the "specified text" is a random phrase

or, more particularly, a randomly generated one-time challenge phrase from words in a data base wherein each word of the phrase is randomly generated.

The Examiner considers that Higgins discloses a data base having a plurality of words and language rules for randomly generating one time challenge phrases citing page 90, section 2. The Examiner is in error.

Higgins discloses that the "speech material" chosen consists of "combination-lock" phrases and that enrollment requires speaking 24 such phrases, which typically takes 3 minutes per enrollment session. It is from these recorded 24 phrases that "Prompted phrases are generated at random". That is, a "prompted phrase" is randomly generated from the prerecorded 24 phrases. A "prompted phrase" is not generated from words in a data base wherein each word of the phrase is randomly generated.

In view of the above, any modification of the text generation section 201 of Hattori to generate a "prompted phrase" as in Higgins would not result in the claimed structure of a first data base having a plurality of words and language rules for randomly generating one-time challenge phrases from said words wherein each word of a randomly generated phrase is randomly generated. For this reason alone, the rejection of claim 1 as being unpatentable over Hattori in view of Higgins is not warranted pursuant to the provisions of 35 USC 103.

Claim 1 requires "a station for receiving information representative of a user from the user and generating a signal responsive thereto" Hattori does not disclose such a structure. Instead, while disclosing a text generation section 201 in the Fig. 5 embodiment, Hattori does not disclose how the text generation section 201 is initiated. Hattori states at col. 14, line 47 *et seq.*

The text generation section 201 generates a specified text to be uttered by an unknown speaker together with a password. The specified text generated by the text generation section 201 is presented to the unknown speaker by means of sound, image, etc. by the presentation section 202, and the unknown speaker is instructed to **input an ID and utter the specified text and the password** in series.

In view of the above, clarification is requested as to where Hattori discloses a station for receiving information representative of a user from the user and generating a signal responsive thereto. In other words, please explain what causes the text generation section 201 to start

Claim 1 requires a controller "communicating with said station to receive a spoken response ... and to generate a **second signal** representative of the spoken response, to process **the entire said second signal** for speaker recognition and to issue a first validation signal in response to a match between said second signal and said stored biometric model, to process **the entire said second signal** for speech recognition and to issue a second validation signal in response to said **second signal exactly matching said one-time challenge phrase ...**". Hattori employs a time correspondence section 506 to generate a reference pattern of the specified text and a reference pattern of a password of one registered speaker who corresponds to the ID which has been inputted by the unknown speaker, and segments the input pattern of the unknown speaker into two parts (i.e. a first input pattern corresponding to the specified text and a second input pattern corresponding to the password). (col. 15, lines 10-23).

Hattori discloses that the two parts of the input pattern of the unknown speaker are separately processed, one in a text verification section 507 and the other in a similarity calculation section 511. (see col. 15, lines 23 -50).

Thus, Hattori does not process the entire input pattern of the unknown speaker in the text verification section 507 and does not process the entire input pattern of the unknown speaker in the similarity calculation section 511.

In view of the above, any modification of the text generation section 201 of Hattori to generate a "prompted phrase" as in Higgins would not result in a "controller..." as claimed. For this additional reason, the rejection of claim 1 as being unpatentable over Hattori in view of Higgins is not warranted pursuant to the provisions of 35 USC 103.

It is understood that the Examiner considers the combination of a "specified text" a password in Hattori to constitute a "one time challenge phrase". However, as noted above, the password is decided by each speaker to be registered on speaker registration. Thus, the password is not generated from a data base.

Claim 2 is believed to be allowable for the same rationale as claim 1. Further, claim 2 requires "in response to validation of said first signal, generating and delivering a randomly generated one-time challenge phrase". As noted above, since the password is generated by the speaker, the combined specified text and password which is considered to be a "challenge phrase" by the Examiner in Hattori cannot be considered a "randomly" generated challenge phrase. Instead, the alleged challenge phrase is dependent on the speaker.

Claim 4 contains recitations similar to claim 1 and is believed to be allowable for

similar reasons. Further, claim 4 requires "said controller communicating with said station to receive and compare a spoken response to said challenge phrase with said entire challenge phrase to verify said spoken response as **exactly matching** said entire challenge phrase". As noted above with respect to claim 1, the text verification section 507 of Hattori does not exactly match the first input pattern (specified text) to the one time challenge phrase (password and specified text). For this reason alone, a rejection of claim 4 as being unpatentable over Hattori in view of Higgins is not warranted pursuant to the provisions of 35 USC 103.

Claim 5 contains recitations similar to claim 2 and is believed to be allowable for similar reasons. Further, claim 5 requires "comparing said spoken response to said entire one-time challenge phrase to verify said spoken response as exactly matching said one-time challenge phrase" As noted above, the text verification section 507 of Hattori does not exactly match the first input pattern (specified text) to the one time challenge phrase (password and specified text). For this reason alone, a rejection of claim 5 as being unpatentable over Hattori in view of Higgins is not warranted pursuant to the provisions of 35 USC 103.

Claims 6, 11 and 14 depend from claim 5 and are believed to be allowable for similar reasons.

Claims 7 and 8 depends from claim 2 and are believed to be allowable for similar reasons.

Claim 16 contains recitations similar to claim 1 and is believed to be allowable for similar reasons.

Claim 17 contains recitations similar to claim 1 and is believed to be allowable for

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similar reasons.

Claim 18 depends from claim 4 and is believed to be allowable for similar reasons. Further, claim 18 requires "said first data base stores said plurality of words and language rules in a plurality of language sets, each said language set being specific to a subject area different from the subject areas of the other of said language sets." Hattori is void of any such teaching. The passages of Hattori cited by the Examiner in support of the rejection are void of any teaching of words and language rules in a plurality of language sets or of any language sets of different subject areas. Note that Hattori discloses only that the "specific text" is "December the twenty-fifth" (see col. 9, lines 63-64). For this reason alone, a rejection of claim 18 as being unpatentable over Hattori in view of Higgins is not warranted pursuant to the provisions of 35 USC 103.

Tattan (newly cited) has been reviewed and is not believed to be pertinent to the claimed method and/or structure.

The application is believed to be in condition for allowance and such is respectfully requested.

Respectfully submitted,



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